



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 4, 2020

By ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

The status conference scheduled for December 15, 2020 is adjourned to February 23, 2021 at 11:00 a.m. Time is excluded under the speedy trial act until 2/23/2021 for the reasons set forth in the government's letter dated December 4, 2020.

SO ORDERED.

Dated: 12/4/2020

P. Kevin Castel
United States District Judge

Re: *United States v. Edinuel Rodriguez Polanco and Felipe Gonzalez*, 20 CR 237 (PKC)

Dear Judge Castel,

The Government writes on behalf of the parties to request respectfully a further adjournment of approximately sixty days of the conference set for December 15, 2020 to a date and time that is convenient for the Court. At this time, the parties anticipate pre-trial dispositions for both defendants but require additional time to achieve those dispositions, principally due to constraints on the ability of counsel to communicate with their clients due to precautionary measures in place at the Metropolitan Correctional Center in response to the ongoing coronavirus pandemic, which have also substantially delayed the ability to conduct proffers pursuant to 18 U.S.C. § 3553(f)(5). [With the consent of the defendants, the Government requests respectfully that the Court exclude time under the Speedy Trial Act from December 15, 2020 through the date of any adjournment pursuant to 18 U.S.C. § 3161(h)(7) on the basis that the interests of the public and the defendants in a speedy trial are outweighed here by the interests of the defendants in being able to achieve a pre-trial disposition and to take the steps necessary to effectuate such a disposition, an exclusion that the Government further submits is appropriate at this time in light of the national emergency declared over the coronavirus pandemic.]

Respectfully,

AUDREY STRAUSS
Acting United States Attorney

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cc: Sylvie Levine (Counsel to Edinuel Rodriguez Polanco) (By ECF)
Eric Franz (Counsel to Felipe Gonzalez) (By ECF)